

1 Tina Wolfson, SBN 174806
twolfson@ahdootwolfson.com
2 Robert Ahdoot, SBN 172098
rahdoot@ahdootwolfson.com
3 AHDOOT & WOLFSON, P.C.
4 10850 Wilshire Boulevard, Suite 370
5 Los Angeles, California 90024
6 Telephone: (310) 474-9111
Facsimile: (310) 474-8585

7 Attorneys for Plaintiff,
8 RANDY BOYSEN

9 JAMES M. SCHURZ, SBN 145874
10 JSchurz@mofo.com
11 MORRISON & FOERSTER LLP
425 Market Street
12 San Francisco, California 94105-2482
13 Telephone: 415.268.7000
14 Facsimile: 415.268.7522

15 Attorneys for Defendant,
16 WALGREEN CO.

17 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA

18
19 RANDY BOYSEN, an individual, on his
20 own behalf and on behalf of all others
similarly situated,

21 Plaintiff,

22 v.

23 WALGREEN CO., an Illinois
24 Corporation d.b.a. WALGREENS; and
DOES 1-10, inclusive,

25 Defendants.

CASE NO. 11-cv-06262-SI

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINE
FOR PLAINTIFF'S FILING OF ANY
AMENDED COMPLAINT**

Current Deadline: August 2, 2012
Proposed Deadline: August 16, 2012

The Honorable Susan Illston

Pursuant to Local Rule 6-2, and for the reasons set forth in the accompanying Declaration of Tina Wolfson, Plaintiff Randy Boysen ("Plaintiff") and Defendant Walgreen Co. ("Defendant") hereby stipulate and request that the Court issue the [Proposed] Order below, to continue the date by which Plaintiff must file any amended complaint in this action, from the current date of August 2, 2012 (per Docket No. 41), until **August 16, 2012**.

Dated: August 2, 2012

AHDOOT & WOLFSON, PC

/s/ Tina Wolfson
Tina Wolfson, Esq.
10850 Wilshire Blvd., Suite 370
Los Angeles, California 90024
Tel: 310-474-9111; Fax: 310-474-8585

Dated: August 2, 2012

**RAM, OLSON, CEREGHINO &
KOPCZYNSKI LLP**

/s/ Michael F. Ram
Michael F. Ram, Esq.
555 Montgomery Street, Suite 820
San Francisco, California 94111
Tel: (415) 433-4949; Fax: (415) 433-7311

Attorneys for Plaintiff, Randy Boysen

Dated: August 2, 2012

MORRISON & FOERSTER

By: /s/ James Schurz
James M. Schurz
425 Market Street
San Francisco, California 94105
T: (415) 268-6449; F: (415) 268-7522
Email: jschurz@mofo.com

Attorneys for Defendant,
WALGREEN CO.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

8/6/12

By:



The Honorable Susan Illston
U.S. District Court Judge

ATTESTATION OF FILER

Pursuant to N.D. Cal. General Order No. 45 § X.B, the undersigned attests that each of the above-named signatories concur in the filing of this Joint Motion.

By: /s/ Tina Wolfson
Tina Wolfson

1 Tina Wolfson, SBN 174806
twolfson@ahdootwolfson.com
2 Robert Ahdoot, SBN 172098
rahdoot@ahdootwolfson.com
3 AHDOOT & WOLFSON, P.C.
4 10850 Wilshire Boulevard, Suite 370
Los Angeles, California 90024
5 Telephone: (310) 474-9111
6 Facsimile: (310) 474-8585

7 Michael F. Ram, SBN 104805
mram@rocklawcal.com
8 J. Kirk Boyd, SBN 122759
kboyd@rocklawcal.com
9 RAM, OLSON, CEREGHINO & KOPCZYNSKI
10 555 Montgomery Street, Suite 820
San Francisco, California 94111
11 Telephone: (415) 433-4949
12 Facsimile: (415) 433-7311

13 Attorneys for Plaintiff,
14 RANDY BOYSEN

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 RANDY BOYSEN, an individual, on his
18 own behalf and on behalf of all others
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19 Plaintiff,

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21 WALGREEN CO., an Illinois
22 Corporation d.b.a. WALGREENS; and
DOES 1-10, inclusive,

23 Defendants.
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CASE NO. 11-cv-06262-SI

CLASS ACTION

**DECLARATION OF TINA
WOLFSON IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINE
FOR PLAINTIFF'S FILING OF ANY
AMENDED COMPLAINT**

Current Deadline: August 2, 2012
Proposed Deadline: August 16, 2012

The Honorable Susan Illston

1 I, Tina Wolfson, declare as follows:

2 1. I am an attorney duly licensed to practice in all courts in the State of
3 California and the District of Columbia. Pursuant to Local Rule 6-2, I submit this
4 declaration in support of the concurrently filed Stipulation and [Proposed] Order
5 Continuing Deadline for Plaintiff's Filing of any Amended Complaint (the
6 "Stipulation") in the above-captioned case. The matters stated herein are true of my
7 own knowledge or, where indicated, I am informed and believe that they are true. If
8 called upon as a witness, I could and would competently testify to these facts.

9 2. The requested extension is necessary in light of my vacation schedule, as I
10 was on vacation from July 19 through 23, and from July 28 through 31, 2012. The
11 requested extension also is required for reasons that constitute matter protected by the
12 attorney-client privilege and by the attorney work product doctrine.

13 3. There have been two previous time modifications in this Action by
14 stipulation: the first extended the deadlines in the Court's Order Setting Initial Case
15 Management Conference and ADR Deadlines (Docket No. 8); and the second
16 modified the hearing date and briefing deadlines on Defendant's motion to dismiss and
17 motion to stay.

18 4. The extension requested in the current Stipulation will have no effect on
19 the schedule for this case, other than requested filing extension itself.
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21 I declare under the penalty of perjury on the 2nd day of August, 2012, that the
22 foregoing is true and correct.
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25 Tina Wolfson
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